

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

TRAVELERS CASUALTY AND SURETY)
COMPANY OF AMERICA,)

Plaintiff,)

vs.)

CASE NO.: 1:08-cv-50008

YOUNG CONSTRUCTION & PAVING,)
LLC, KAREN B. YOUNG, GORDON T.)
YOUNG, JEFFREY D. YOUNG, MONICA L.)
YOUNG, JOSEPH WELLS, TERRI WELLS,)
LUKE D. VANDER BLEEK and JOAN L.)
VANDER BLEEK,)

Defendants.)

MOTION TO EXTEND TIME TO FILE AFFIRMATIVE DEFENSE

NOW COME the Defendants, KAREN B. YOUNG, GORDON T. YOUNG, JEFFREY D. YOUNG and MONICA L. YOUNG, by their attorneys, BARRICK, SWITZER, LONG, BALSLEY & VAN EVERA, and moves the Court for an extension of time to file affirmative defenses to the Complaint herein, and in support thereof states as follows:

1. The Defendants, KAREN B. YOUNG, GORDON T. YOUNG, JEFFREY D. YOUNG and MONICA L. YOUNG, believe that they may have one or more affirmative defenses to the Complaint filed by the Plaintiff herein.
2. The Defendants are in the process of gathering information and conducting an investigation to find supporting documents for such affirmative defense.
3. The attorneys for the Defendants require to time to review such documents when they become available in order to prepare and file the affirmative defense.
4. The attorneys for the Defendants believe that it will take approximately 21 days to gather such information.

WHEREFORE, the Defendants, KAREN B. YOUNG, GORDON T. YOUNG, JEFFREY D. YOUNG and MONICA L. YOUNG, move the Court for an extension of time to file one or more affirmative defenses to the Complaint herein to March 15, 2008, and for such other relief as may be appropriate.

BARRICK, SWITZER, LONG,
BALSLEY & VAN EVERA

By:

/s/Stephen G. Balsley

STEPHEN G. BALSLEY

Stephen G. Balsley – 0104841
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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TRAVELERS CASUALTY AND SURETY
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vs.

YOUNG CONSTRUCTION & PAVING,
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YOUNG, JOSEPH WELLS, TERRI WELLS,
LUKE D. VANDER BLEEK and JOAN L.
VANDER BLEEK,

Defendants.

CASE NO.: 1:08-cv-50008

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NOTICE OF FILING

I HEREBY CERTIFY that on February 15, 2008, I electronically filed the foregoing **MOTION TO EXTEND TIME TO FILE AFFIRMATIVE DEFENSE** with the Clerk of the United States District Court, Northern District of Illinois, for the Western Division, using the CM/ECF system, that I have served all CM/ECF Registered Participants, as reflected on the Notice of Electronic Filing and that I have served all non CM/ECF participants by mailing a copy via first-class U.S. Mail, with proper postage prepared and affixed thereon, on February 15, 2008.

/s/Stephen G. Balsley
STEPHEN G. BALSLEY

PROOF OF SERVICE

I HEREBY CERTIFY that on February 15, 2008, I have served all CM/ECF Registered Participants as reflected on the Notice of Electronic Filing and that I have served all non CM/ECF participants by mailing a copy via first class U.S. Mail, with proper postage prepared and affixed thereon, on February 15, 2008.

/s/Stephen G. Balsley
STEPHEN G. BALSLEY

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